IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of: **CLARKE ET AL.**	
Serial No. **10/787,515**	Attorney Docket No.: **ID-910 (80233)**
Confirmation No. **6465**	Examiner: **R. TIMBLIN**
Filing Date: **FEBRUARY 26, 2004**	Art Unit: **2167**
For: **COMMUNICATIONS SYSTEM HAVING DISTRIBUTED DATABASE ARCHITECTURE AND RELATED METHODS**	

PRE-APPEAL BRIEF REQUEST FOR REVIEW

EFILE
Commissioner for Patents

Sir:

Responsive to the final Office Action of October 13, 2011, and in connection with the Notice of Appeal filed concurrently herewith, please consider the remarks set out below.

REMARKS

Based upon the arguments presented below, Applicants respectfully request the Pre-Appeal Brief Conference Panel reconsider and withdraw the Examiner's rejections of the claims.

I. The Claimed Invention

The present invention, as recited in independent Claim 1, for example, is directed to a communications system that may comprise a plurality of e-mail account databases, each configured to store information associated with different e-mail accounts. The communication system may also include a central database configured to store location information associating each e-mail account with a respective e-mail account database, and shared system setup information for accessing the plurality of e-mail account databases, a communications device configured to access e-mail account information, and an interface device. The interface device may be configured to receive an e-mail account access request from the communications device for a desired e-mail account, retrieve and cache e-mail account location information from the central database for the desired e-mail account, and initially and subsequently interface the communications device with the respective e-mail account database associated with the desired e-mail account based upon the e-mail account location information, and retrieve and cache the shared system setup information by the respective e-mail account database to interface the communications device with the respective e-mail account database.

Independent Claim 9 is directed to an interface device sub-combination. Independent Claim 14 is directed to a method counterpart to Claim 1. Independent Claim 17 is directed to a related computer-readable medium.

II. The Claims Are Patentable

The Examiner rejected independent Claims 1, 9, 14, and 17 over Arnold et al. in view of Rierden et al. and Skene et al. Arnold et al. discloses a communication system comprising a client 102, a plurality of e-mail host servers 114a-114n, and a proxy server coupled between the client and the e-mail host servers. The proxy server is configured to provide the

client a combined integrated e-mail view of all e-mail account inboxes for a particular user. The communication system also includes a mail registration database 108 for storing user ID, account numbers, ISP, and Internet addressing for the e-mail accounts. The user may make deletions and other related e-mail commands in the combined e-mail view, which are transferred via the proxy server to the individual e-mail host for that account. (Col. 2, line 51 through Col. 3, line 64).

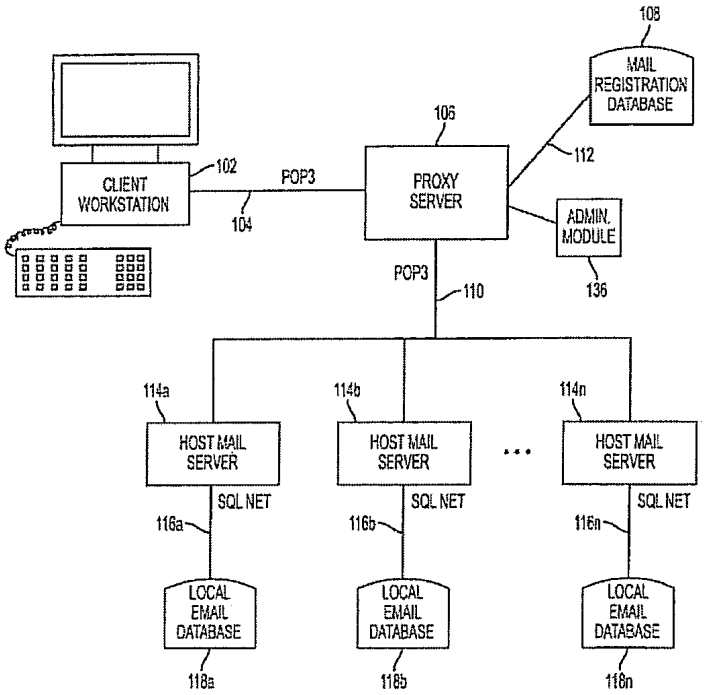


Figure 2 of Arnold et al.

The Examiner notes that Arnold et al. fails to disclose or fairly suggest the central database storing location information associating each e-mail account with a respective e-mail account database, as recited by independent Claim 1, for example. The Examiner looks to Rierden et al. for this deficiency.

Rierden et al. discloses a subscriber management system that includes at least one Data Directory Server (DDS) located between one or more transaction generators and one or more data servers. The DDS routes transactions and provides data location functions. Based upon internal rules within the DDS and the particular transaction type, the DDS routes transactions to the appropriate servers. Transactions are classified according to where they may

be executed. Specifically, transactions may be classified as SPECIFIC, ANY, or ALL. (Col. 4, lines 11-28). The system of Rierden et al. further comprises an X-REF server for storing the location information, global tables, so the DDS accesses the correct data server based upon the data needed by the transaction request. (Col. 8, lines 31-39).

The Examiner correctly notes that neither Arnold et al. nor Rierden et al. discloses or fairly suggests retrieving and caching e-mail account location information from the central database for the desired e-mail account, and initially and subsequently interfacing the communications device with the respective e-mail account database associated with the desired e-mail account based upon the e-mail account location information, as recited by independent Claim 1, for example.

The Examiner looks to Skene et al. for this deficiency. Skene et al. discloses a method for resolving a domain name for virtual servers to an IP address of a related database, which may be distributed geographically. When the user makes a request for resources at a domain name, a local cache of resolved IP addresses is checked, and if the domain name is stored therein, the user is provided the cached IP address. If the resolved IP address for the domain name is not stored in the cache, the IP address is looked up.

Applicants respectfully submit that the proposed combination of prior art references fails to disclose or fairly suggest each feature of the claimed invention. In particular, Arnold et al. fails to disclose the central database storing shared system setup information for accessing said plurality of e-mail account databases, as recited in independent Claim 1. Differently, the mail registration database of Arnold et al. stores a user ID, an account number, an ISP, and Internet addressing. The data stored appears related solely to each individual e-mail account, rather than shared system setup information of the claimed invention.

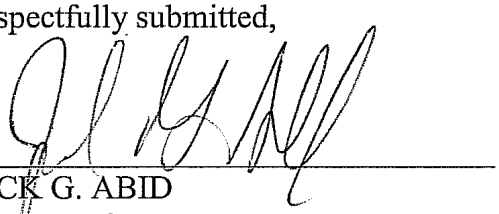
Applicants submit that the proposed combination of prior art references is not supported by sufficient rationale to combine. In particular, Applicants submit that the person of ordinary skill in the art would be taught away from combining Arnold et al. and Skene et al. Skene et al. discloses a method for resolving dynamic IP addresses for domain names pointing to virtual servers and not an e-mail host proxy, as in Arnold et al. The primary thrust of Skene et al. is to resolve a domain to a dynamic IP Address for a virtual server. The skilled person would

appreciate that the ISP email hosts, to which Arnold et al. is directed to assist, do not use virtual servers but instead utilize static IP addresses. Indeed, the static IP address is likely stored in the mail registration database of Arnold et al. In other words, the skilled person would appreciate that Skene et al. applies to a virtual server environment that is ill fitted to email hosting.

Moreover, Skene et al. discloses that load "balancing the [] demand between geographically distributed servers for web-based applications and content such as e-mail and streamed multimedia data has proven to be difficult for several reasons." (Paragraph 3). Given that Arnold et al. is directed to an integrated e-mail inbox, the skilled person would be taught away from combing the teachings of Skene et al. into Arnold et al. Because of these reasons, Applicants submit that the skilled person would be taught away from selectively combining disparate elements of Arnold et al. and Skene et al.

Accordingly, it is submitted that independent Claims 1, 9, 14, and 17 are patentable over the prior art. Their respective dependent claims, which recite yet further distinguishing features, are also patentable over the prior art and require no further discussion herein.

Respectfully submitted,



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